

Mar 27, 2009

Corbin T. Jones
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Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Identification Number: C00003418

Reference: 30-Day Post-General Report(10/16/08-11/24/08)

Dear Mr. Jones:

This correspondence is in response to your Request for Additional Information (RFAI) for the above referenced report.

Regarding contributions disclosed on Schedule A in excess of limits, we have researched the items in question and amended our report to reflect accurate information. A refund check has been sent to the donor and a photocopy has been sent to FEC for all cases where the contributions have been determined to be in excess of limits.

Contributions received from corporations that have not been attributed to partners have been refunded and the report has been annotated to reflect same. Photocopies of the refunds have been sent to FEC. In the case of partnerships contributions, the partner share has been reported in a memo Schedule A to reflect the individual share.

Regarding contributions received from PACs disclosed on Schedule A in excess of limits, we have researched the items in question and amended our report to reflect accurate information. A refund check has been sent to the donors and a photocopy has been sent to FEC for all cases where the contributions have been determined to be in excess of limits.

Aggregate totals reported on Schedule A for contributions received from individuals are affected by refunds we have made to these contributors and corrections to the contribution database which identifies individuals. As we continue to research contribution activity in order to accurately report, we amend our reports. We have amended our report where necessary to correct the aggregate totals you identified. In such cases where the total indicates contributions in excess of regulated limits, we have made refunds to the contributors and sent a photocopy of the refund check to FEC.

We have amended our report to more accurately describe the activity previously reported as "ENTERTAINMENT", "ENTERTAINMENT COST", "EQUIPMENT RENTAL", and "PRODUCTION COST" for the disbursements you indicated.

Regarding voided checks, we have indicated in the memo field the date of the corresponding disbursements to facilitate your research. The offsetting entries are contained within this same report.

Regarding Schedule E, pursuant to 11 CFR 104.4(c), the Republican National Committee (RNC) timely filed the required 24-hour notices for each of the independent expenditures identified in the attachment to your letter of March 4, 2009 (March Letter). In each case, the independent expenditures identified in March Letter represent media buys to place several advertisements paid for by the RNC. Further, to clarify, the Date column represents the date that money was wired to the vendor to place the ads (i.e., the buy dates), not the dates that the advertisements were in fact released. In each of the instances noted in your March Letter, the required notice was filed the within 24 hours of the release date of the advertisement in compliance with the provisions of 11 CFR 104.4(c). Further, pursuant to 11 CFR 104.3(b), these expenditures were fully itemized on Schedule E of the Committee s Post-General report, which was filed

ETEXT ATTACHMENT

on January 22, 2009 (FEC Report # 397231).

Regarding Independent Expenditures, pursuant to 2 USC 431(17), the independent expenditures made by the RNC in support of John McCain meet the definition of and were properly categorized as independent expenditures. The expenditures expressly advocated the election or defeat of John McCain, and were not made in concert or cooperation with or at the request or suggestion of Senator McCain or his presidential campaign committee. Indeed, before any expenditures were made, the RNC through its Counsel's Office established certain policies and procedures to ensure that the said independent expenditures satisfied all legal requirements. For example, they were not based on any information provided to the RNC by the McCain campaign or its agents, or RNC staff or its agents. Further, the independent expenditure unit was comprised of outside, independent consultants who operated in office space physically separated from the rest of the RNC. The independent consultants selected had not done any work on behalf of the McCain campaign or the RNC for at least 120 days prior to retaining them, nor had they discussed with anyone at the McCain campaign any possible or proposed RNC independent expenditures. In addition, RNC staff did not have any contact or communication with the independent consultants, except where necessary for reporting and/or compliance purposes (e.g., administrative staff for reporting and compensation purposes) and legal staff to ensure legal compliance). And, the independent consultants were instructed not to have any communication or interaction with anyone at the McCain campaign or the RNC until Election Day.

We have amended our report to more accurately describe the coordinated expenditure activity previously reported as "CAMPAIGN ACCESSORIES" for the disbursements you indicated.

Schedule F aggregate expenditures for John McCain are accurately reported. The variance you found neglected to deduct refunds from the committee that were reported as receipts on line 16.

I am pleased to say that we have been able to address each of many the items listed in your request for additional information. Each item has either been determined to have been correctly reported or has been updated with correct or additional information. I trust this response will meet your requirements, however please feel free to contact me if you have any remaining questions.

Sincerely,

Pat Huyck
Director of Accounting
